IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

MARTIN J. WALSH, SECRETARY OF LABOR, U.S. DEPARTMENT OF LABOR,

Case No. 4:22-cv-3246

Plaintiff,

v.

UNOPPOSED MOTION TO SEAL

PACKERS SANITATION SERVICES, INC., LTD.,

Defendant.

Defendant Packers Sanitation Services, LLC, named in the Complaint as Packers Sanitation Services, Inc., Ltd. ("PSSI") has filed a redacted exhibit for the Declaration of Magdalena Garcia Hernandez along with an Exhibit A attached to its Index of Evidence filed on December 2, 2022 in support of its Brief in Opposition to Motion for Temporary Restraining Order and Preliminary Injunction, and hereby requests leave to file an unredacted version under seal because portions of the exhibit contain personal information (date of birth and employment authorization identification) that should be protected from public view. In further support of this motion, counsel for PSSI has advised counsel for the Secretary and he does not oppose this motion.

Dated this 2nd day of December, 2022.

Respectfully submitted,

/s/ Patrick M. Dalin

J. Randall Coffey

FISHER & PHILLIPS LLP

46 Penn Centre

4622 Pennsylvania Avenue, Suite 910

Kansas City, MO 64112 Phone: (816) 842.8770 Facsimile: (816) 842.8767

Email: rcoffey@fisherphillips.com

Patrick M. Dalin

FISHER & PHILLIPS LLP

Two Logan Square 100 N. 18th Street, 12th Floor Philadelphia, PA 19103 Phone: (610) 230-6112 Facsimile: (610) 230-2151

Email: pdalin@fisherphillips.com

Admitted Pro Hac Vice

And

Gillian G. O'Hara # 22414

KUTAK ROCK LLP

The Omaha Building 1650 Farnam Street Omaha, NE 68102-2186 Phone: 402.346.6000 Facsimile: 402.346.1148

Email: gigi.ohara@kutakrock.com

ATTORNEYS FOR DEFENDANT PACKERS SANITATION SERVICES, LLC.

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2022, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to the following attorneys registered with the CM/ECF system:

Ambriel Renn-Scanlan Traci Martin Laura O'Reilly U.S. Department of Labor Office of the Secretary 2300 Main Street, Suite 10100 Kansas City, Missouri 64108 Phone: 816.285.7260

Email: martin.traci.e@dol.gov
Email: martin.traci.e@dol.gov
Email: oreilly.laura.m@dol.gov

Counsel for Plaintiff

/s/ Patrick M. Dalin
Patrick M. Dalin